

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No.08 CV 1999
)	(97 CR 63-1)
)	
)	Judge George W. Lindberg
TERRY YOUNG)	

GOVERNMENT’S MOTION FOR EXTENSION OF TIME

The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves this Court for a forty-five day extension of time to August 14, 2008, to submit the government’s response to defendant Terry Young’s motion to vacate, set aside, or correct his sentence. In support thereof, the government states as follows:

1. On May 22, 2008, undersigned counsel was assigned to respond to defendant Terry Young’s 39-page motion to vacate, set aside, or correct his life sentence for conspiracy to possess with intent to distribute cocaine, cocaine base, and heroin; possession of cocaine with intent to distribute; and money laundering.

2. The government’s response is due on or before June 30, 2008.

3. Undersigned counsel is engaged in substantial other litigation, including a ten-defendant securities fraud jury trial scheduled for July 14, 2008, before Judge Blanche Manning which is expected to last three to four weeks.

For the reasons stated above, the government respectfully requests a forty-five day extension of time to August 14, 2008, to file the government’s response to defendant Terry Young motion to vacate, set aside, or correct his sentence.

Respectfully submitted,
PATRICK J. FITZGERALD
United States Attorney

By: s/ John F. Podliska
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CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed R. Civ. P. 5, LR5.5, and the General Order of Electronic Case Filing (ECF), the following documents:

GOVERNMENT’S MOTION FOR EXTENSION OF TIME

was served pursuant to the district court’s ECF system to ECF filers and by mail to the following non-ECF filers on June 23, 2008:

Terry Young
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